

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

CARLTON M. ROBERTS

**CHAPTER** 13

**CASE NO.** 5 - 17 .bk- 03116 MJC

**Debtor(s)**

CARLTON M. ROBERTS

**ADVERSARY NO.**     -     ap-             
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

STEARNS LENDING, LLC, BY LOANCARE,  
LLC and MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.

**Nature of Proceeding:** Objection to  
Notice of Mortgage Payment Change

JACK N. ZARAPOPOULOS,  
STANDING CHAPTER 13 TRUSTEE

**Defendant(s)/Respondent(s)**

**Document #:** 87

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Parties are in process of negotiating a resolution.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 02/09/2022

/s/ Timothy B. Fisher, II

Attorney for Debtor

Name: Timothy B. Fisher, II

Phone Number: (570) 842-2753

<sup>1</sup> No alterations or interlineations of this document are permitted.